



ALLEGAN COUNTY SHERIFF DEPARTMENT

112 WALNUT STREET • ALLEGAN, MICHIGAN 49010-1250

David Haverdink
Sheriff

Larry Ladenburger
Undersheriff

August 5, 1994

RECEIVED

AUG 11 1994

The Honorable Reed E. Hundt
Federal Communications Commission
1919 M. Street, N.W.
Washington, D.C. 20554

RE: Billed Party Preference; CC Docket No. 92-77

Dear Sir:

Please be advised that the Allegan County Jail has used an inmate phone system for outgoing calls for many many years, even prior to being able to select our own local and long distance company and equipment provider. Once the law was changed and we were allowed to do so, we've noticed an improvement in the quality of the equipment provided for use by the inmates, the reduction of fraud committed by the inmates, the amount of interaction my staff has to have with the inmate phone system, and last but not least, we began to generate some revenue for the county from the usage of the phones by the inmates. We currently select a provider by, not only the commission the county can receive, but also the quality of equipment, the repair time, and the ability of the company to stop inmate fraud. We also do everything within our power to ensure that a fair and equitable rate is charged for the long distance service. Any issues related to the cost of the inmate or their family are immediately addressed with the provider and the inmates are also advised that the calls are collect only and that the cost is higher than if they would be calling from their residence, so that they can adjust their calling if they wish to reduce the cost to their friends and family.

The Allegan County Jail would be extremely dissatisfied with any regulation that would restrict our selection of a provider of phones and service for the inmates. We believe that we would see an increase in the fraud perpetrated by the users of the phones, increase in the damage to the equipment, increased interaction of my staff with the phone equipment and ultimately a reduction of the phones or the access to phones by the inmates.

No. of Copies rec'd
List ABCDE

To protect and serve the people of Allegan County

Accident Records 673-4055
Administrative 673-5444
Central Dispatch 673-3899

Civil Process 673-5445
Detective Bureau 673-8110
Jail Administration 673-5548
..... 673-8100

Jail Inmate Info 673-7353
Patrol Division 673-5447
Youth Services 673-8110



ALLEGAN COUNTY SHERIFF DEPARTMENT

112 WALNUT STREET • ALLEGAN, MICHIGAN 49010-1250


David Haverdink
Sheriff

Larry Ladenburger
Undersheriff

I believe that if the FCC wishes to regulate the inmate phone industry, because of real or perceived problems with their billing for the service, it would be better to set some regulation on the amount that can be charged for the service and still allow jails and correction facilities to select their own provider, maintaining control over the phone system, the options that they wish to have in their phone system, and the possibility for some revenue to be generated for the facility.

In the end, I believe all correctional facilities and jails, wish to have a phone system which provides the security against fraud and control over who the inmates can call, it's equipment that is almost indestructible and which reduces the amount of time the staff has to deal with the phone system. They also would like to see that some of the monies generated by these phone companies, be shared with the facilities that allow them to have access to their inmate population. By doing so, that helps offset the cost of the operation to the citizens of the county or state where the facility is maintained, therefore we would be against having this proposal become a requirement, thereby eliminating the inmate phone system as we currently have it.

Sincerely,


Lt. James C. Ross
Jail Administrator
Allegan County Sheriff's Dept.

cc: The Honorable James H. Quello
The Honorable Andrew C. Barret
The Honorable Rachelle B. Chong
The Honorable Susan Ness
Senator Donald W. Reigle Jr.
Representative Peter Hoekstra
Sheriff David Haverdink

To protect and serve the people of Allegan County

Accident Records 673-4055
Administrative 673-5444
Central Dispatch 673-3899

Civil Process 673-5445
Detective Bureau 673-8110
Jail Administration 673-5548
..... 673-8100

Jail Inmate Info 673-7353
Patrol Division 673-5447
Youth Services 673-8110



Parris N. Glendening
County Executive

THE PRINCE GEORGE'S COUNTY GOVERNMENT
DEPARTMENT OF CORRECTIONS

13400 DILLE DRIVE, UPPER MARLBORO, MARYLAND 20772



July 26, 1994

RECEIVED

AUG 11 1994

The Honorable Reed E. Hundt
Chairman, Federal Communications Commission
1919 M Street, N. W.
Washington, D.C. 20554

**SUBJECT: Opposition to Billed Party Preference
CC Docket No. 92-77**

Dear Chairman Hundt:

Reference is made to the Federal Communications Commission consideration of billed party preference for correctional facilities. We feel that applying such a preference to inmate phone systems would create significant logistical and security problems which would far outweigh the benefits provided.

Our experience has shown through the years that fraud, abuse, and other illegal activity can easily be carried on over the phone lines, unless we have a system in place that can be more tightly controlled. For example, if an inmate harasses a citizen, we can arrange to have a block placed on that particular phone number. This is especially important when you are dealing with witnesses who could be intimidated. I am concerned that if we were compelled to depend on multiple phone systems to enforce such restrictions that we could not guarantee results.

In addition to security concerns, there would be a significant fiscal impact as well. By working with one phone company, correctional facilities have been able to obtain phone equipment which would have been cost prohibitive if we were required to purchase ourselves. Phones are very important from a security standpoint because communication with family members reduces tension among our inmate population.

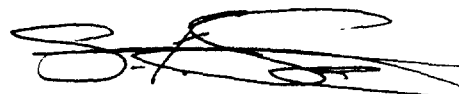
Finally, we realize that some telephone companies associated with correctional facilities have been known to charge non-competitive rates. We appreciate the Federal

No. of Copies rec'd
List ABCDE

The Honorable Reed E. Hundt
Page 2

Communications Commission's concern in this matter and welcome the Commission's assistance in developing rate ceilings which can be enforced contractually with telephone providers. In that way we could continue to maintain the security of our phone system while providing the consumer with quality service at competitive rates.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. F. Saxton', with a large, sweeping flourish extending to the right.

Samuel F. Saxton
Director

SFS/pp

cc: The Honorable James H. Quello
The Honorable Rachelle B. Chong
—The Honorable Andrew C. Barrett
The Honorable Susan Ness
APCC Inmate Phone Service Providers Task Force



RECEIVED

AUG 11 1994

805 12TH STREET
MODESTO, CALIFORNIA 95354
(209) 525-6439

STANISLAUS COUNTY

LES WEIDMAN

SHERIFF - CORONER
PUBLIC ADMINISTRATOR

July 26, 1994

The Honorable Reed E. Hundt, Chairman
Federal Communications Commission
1919 M Street, NW
Washington, D.C. 20554

re: CC Docket No. 92-77 Opposition to Billed Party Preference

Dear Chairman Hundt:

We are opposed to the application of Billed Party Preference (BPP) at inmate facilities. Inmate telephone use is not and cannot be construed in the same light as public use. We, as administrators of the custodial facilities, must balance the needs of inmates and the protection of the public as it relates to telephone usage by inmates. Inmates not only abuse the telephone service through fraud but also commit crimes by the use of the telephones in the custodial facilities as well as their use to intimidate and threaten their victims and those who are witnesses against them. With all of this in mind, it is imperative that each facility administrator have the ability to contract with a telephone provider who will handle the out-going calls in a manner that is consistent with our concerns. There is a need for sophisticated equipment to detect the fraud and other abuse of the telephone network. We need to have the ability to give people notice that they are accepting a call from a custodial facility and we also need to have the ability to block calls originating from the jail facility to certain private numbers. In our estimation, BPP will not allow us to do any of the aforementioned security measures.

The telephone equipment that needs to be installed in a custodial facility must be of a very substantial nature and is much more expensive than that found in the normal public installation. Without the ability to contract with inmate telephone companies whose specialty is the serving of custodial facilities, we might not be able to provide inmates with telephone access. This would have a devastating effect on the morale of inmates within our system. We also utilize the revenue sources from the inmate telephone companies to provide other activities and resources for the inmate during their stay. These funds are also used to assist in counselling services to families and educational services to the inmates. We feel that BPP will virtually eliminate this source of revenue.

We do appreciate the concerns of the rates that are being charged with the inmates' families and we, in our contracts, require that the tariff rate for the local carrier be adhered to and we would recommend that any concerns that the FCC might have regarding abusive rates could be handled by the adoption of rate

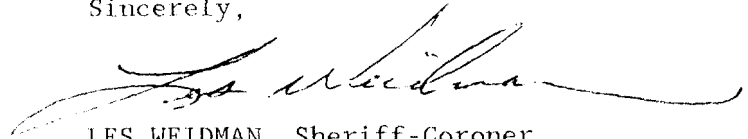
No. of Copies rec'd 1
List ABCDE

"KEEPING THE PEACE SINCE 1854"

ceilings on inmate telephone calls rather than the utilization of the Billed Party Preference for inmate facilities.

In short, BPP would take away our ability to employ important security and administrative measures that we have found to be necessary at our facilities. Ultimately reducing inmate phone availability which in turn decreases the efficiency of our staff. We urge you not to adopt regulations that interfere with our administrative and security decisions, decisions that are clearly within our discretion and which we have a public responsibility to make.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Les Weidman', with a long, sweeping horizontal stroke extending to the right.

LES WEIDMAN, Sheriff-Coroner
Stanislaus County

LW:RB:bb

cc: The Honorable James H. Quello
The Honorable Rachelle B. Chong
The Honorable Andrew C. Barrett
The Honorable Susan Ness
Senator Diane Feinstein
Representative Gary Condit



OFFICE OF THE
SHERIFF
COUNTY OF YATES

Public Safety Building • 227 Main Street

Penn Yan, New York 14527

Phone: (315) 536-4438

Fax: (315) 536-5191

RONALD G. SPIKE
Sheriff

JOHN C. GLEASON
Undersheriff

July 27, 1994

PHONES:

Administration
(315) 536-5172

Criminal Division
(315) 536-5176

Juvenile Aid Division
(315) 536-5177

Jail Division
(315) 536-5175

Civil Division
(315) 536-5174

Records Division
(315) 536-5178

The Hon. Andrew C. Barrett
Federal Communications Commission
FCC Secretary's Office
1919 M. Street, NW Room 222
Washington, DC 20554

Dear Mr. Barrett:

It has recently come to my attention that there is a matter called Billed Party Preference (BPP). This matter involves possible regulation by the Federal Communications Commission regarding inmate telephone systems.

Some of the concerns I see, should this legislation pass, would involve the possibility of a person receiving a collect call from an inmate, not being given the opportunity to know that the call is indeed coming from a correctional facility before a decision is made whether to accept it or not. The capabilities of phone number blocking have been relatively easy for us to achieve. Additionally, should the receiver of the collect call have the option to choose the long distance carrier, this could very likely reduce the revenues returning to our facility. These monies are returned to our commissary account which we use for enhancement of inmate life, such as our recent paving of the recreation yard and purchases of recreational items for them. A controlled inmate phone system has also freed up our correction personnel from having to escort inmates to and from a telephone for the purpose of making their calls, be they legally related or private.

I see some major drawbacks that would affect local correctional facilities such as mine should this legislation be passed. I ask you to consider opposing this action.

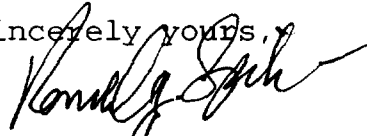
No. of Copies rec'd _____
List ABCDE _____

0

Hon. Andrew C. Barrett
July 27, 1994
Page 2

Thank you for your time and consideration.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Ronald G. Spike", with a long horizontal flourish extending to the right.

Ronald G. Spike
Sheriff of Yates County

RGS:sst

**Corrections Commission
of
Northwest Ohio**

03151 Road 24.25
Route 1, Box 100-A
Stryker, Ohio 43557
419/428-3800
FAX: 419/428-2119

RECEIVED

AUG 11 1994

1000 A. M. 11/11/94

Defiance County

Executive Committee:

David Westrick
Robert Switzer
Joseph Schmenk

Fulton County

Vice Chairman:

James Barber
Lowell Rupp
Darrell Merillat

Henry County

Chairman:

John Nye
Kenneth Rohrs
Richard Bertz

Lucas County

Executive Committee:

James Telb
Sandy Isenberg
Stephen Yarbrough

Toledo

Executive Committee:

Carleton Finkbeiner
Mary Grace Trimboli
Gerald Galvin

Williams County

Secretary:

Robert Wilson
Alan Word
Rosanne Fisher

Executive Director:

Jim Dennis

July 25, 1994

The Honorable Andrew C. Barrett
Federal Communications Commission
1919 M Street, NW
Washington, D.C. 20554

RE: CC Docket No. 92-77 Opposition to Billed Party
Preference

Dear Mr. Barrett:

I am opposed to the application of Billed Party
Preference (BPP) at inmate facilities.

I have analyzed the security and administration needs at our facility and have found it to be necessary to route inmate calls from our facility to a single carrier that is equipped to handle inmate calls and with whom we have a contractual relationship. We cannot allow inmates to have open access to the telecommunications network and the freedom to use any carrier they please. BPP will take away our responsibility to coordinate inmate calls through a carrier we know and trust. Instead, inmate calls will be routed to a number of different carriers, none of whom will have any obligation to us and few that will be trained to handle inmate calls. Criminal behavior with the phones will be uncontrollable.

We have also found it necessary to install phone equipment that is specifically designed for inmate calls. This equipment helps prevent fraud, abusive calls, and other criminal activity over the telephone network. Inmate phone providers evolved as a result of such uncontrolled criminal activity. Given the constant budgetary constraints that we are under, we cannot afford to provide this equipment without the help of inmate phone service providers. BPP would also eliminate the revenue stream that finances our inmate phones. If BPP is applied to inmate facilities, there will be no way for us to finance these phones, nor will there be inmate phone service providers to assist us. Without inmate phones, the morale of our inmates will be devastated. The

No. of Copies rec'd
List ABCDE

0

Page 2

resulting increase in tension will make it more difficult for our staff to manage inmates.

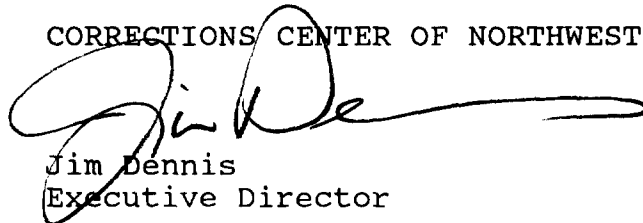
Furthermore, we are sensitive to the rates inmate families pay for calls. We fully appreciate the FCC's concern if some Sheriff or Warden does not take responsibility for protecting inmate families from abusive rates. We do not agree with the FCC that the solution for this lack of responsibility is BPP. The proper and more effective action would be to adopt rate ceilings on inmate calls and then let Sheriffs or Wardens enforce these rate ceilings through their contracts. Indeed we believe the overwhelming majority of Sheriffs and Wardens are committed to requiring rates that are fair and reasonable. BPP is clearly an over reaction. Setting ceilings would be more responsible legislation.

In short, BPP would take away our ability to employ important security and administrative measures that we have found to be necessary at our facility. We urge you to not adopt regulations that interfere with our administrative and security decisions -- decisions that are clearly within our discretion and which we have a public responsibility to make.

Approving such legislation as BPP as currently written will also enable such inmate advocate groups to pursue other legislative agendas that exceed the intent of current case law, prisoner rights as guaranteed by our forefathers in the constitution and would encourage you to ignore what the professionals in the corrections field need to protect the public.

Respectfully submitted,

CORRECTIONS CENTER OF NORTHWEST OHIO

A handwritten signature in black ink, appearing to read "Jim Dennis", is written over the typed name and title.

Jim Dennis
Executive Director

/pa

c:\jd\Inmate.Phn



The Voice of Rural Telecommunications

August 2, 1994

Mr. William F. Caton
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

RE: CC Docket No. 92-77

Yesterday, the National Telephone Cooperative Association filed Comments in response to the Commission's Further Notice of Proposed Rulemaking, FCC 94-117, released on June 6, 1994, regarding Billed Party Preference for 0+ InterLATA Calls. Page four of the Comments was inadvertently omitted from the filing. Page four is attached so that it can be included with the Comments filed yesterday. All parties who have not received page four will be mailed the omitted page.

If you have any questions, please contact the undersigned.

Sincerely yours,

David Cosson
Vice President
Legal and Industry

DC:rhb

Enclosure

No. of Copies rec'd 1
List ABCDE

can one determine the merits of BPP.³ This sort of evaluation argues against the Commission adopting generalized conclusions and universal rules.

In any event, there is certainly many rural areas where the number of O+ calls and the number of affected transient users will be small, and this will mean that the per-unit cost of BPP will be enormous. Therefore, at the very least, should the Commission decide to move forward with its generalized requirement (which NTCA does not favor), then end offices below a specific cost/benefit limiting size should be exempt from any mandatory requirement.⁴

II. BPP IS UNNECESSARY; MEASURES ARE ALREADY IN PLACE THAT WILL ACHIEVE THE SAME BENEFITS AS PERCEIVED TO BE PROMOTED BY BPP.

Fundamentally, the potential benefits of BPP will flow to transient callers⁵ who must make interLATA calls, but without BPP would not otherwise be able to have their call carried by their carrier of choice.⁶ Problems associated with callers who

³ Using Rural Electrification Administration borrower data, small and rural telcos typically have less than 10 paystations per exchange. While impossible to determine accurately, the number of transient users must be small relative to urban highly-populated areas.

⁴ NTCA believes that 10,000 access lines per end office would be an appropriate cut-off point.

⁵ Transient callers are those who must make calls from phones that are not necessarily presubscribed to their carrier of choice. Most often, this will involve calls made from payphones.

⁶ O+ interLATA calls placed from normal residential and business line phones already presubscribed to IXCs do not appear to present any problem to be solved by BPP. Presumably, the
(continued...)

CERTIFICATE OF SERVICE

I, Gail C. Malloy, certify that a copy of the foregoing Comments of the National Telephone Cooperative Association in CC Docket No. 92-77 was served on this 2nd day of August 1994, by first-class, U.S. Mail, postage prepaid, to the following persons on the attached service list:


Gail C. Malloy

Chairman Reed E. Hundt
Federal Communications Commission
1919 M Street, N.W., Room 814-0101
Washington, D.C. 20554

Commissioner James H. Quello
Federal Communications Commission
1919 M Street, N.W., Room 802-0106
Washington, D.C. 20554

Commissioner Andrew C. Barrett
Federal Communications Commission
1919 M Street, N.W., Room 826-0103
Washington, D.C. 20554

Commissioner Rachelle B. Chong
Federal Communications Commission
1919 M Street, N.W., Room 844-0105
Washington, D.C. 20554

Commissioner Susan Ness
Federal Communications Commission
1919 M Street, N.W., Room 832-0104
Washington, D.C. 20554

Mr. Kent Nilsson, Chief
Cost Analysis Branch, Accounting
and Audits Division
Common Carrier Bureau
Federal Communications Commission
2000 L Street, N.W., Room 812-1600E
Washington, D.C. 20554

International Transcription Service
2100 M Street, N.W.
Suite 140
Washington, D.C. 20037

James L. Wurtz, Esq.
Ms. Jo Ann Goddard
Pacific Bell and Nevada Bell
1275 Pennsylvania Avenue, N.W.
4th Floor
Washington, D.C. 20004

Ellen S. Deutsch, Esq.
Citizens Utilities Company of
California
P.O. Box 496020
Redding, CA 96049-6020

Veronica A. Smith, Esq.
John F. Povilaitis, Esq.
Pennsylvania Public Utility
Commission
P.O. Box 3265
G-28 North Office Building
Harrisburg, PA 17105-3265

Charles P. Miller, Esq.
Value-Added Communications, Inc.
1901 So. Meyers Rd., Suite 530
Oakbrook Terrace, IL 60181

Mr. Barry Fitzgerald, V-President
North American InTeleCom
1200 Crownpoint Drive
San Antonio, Texas 78233

Mr. James R. Monk, Chairman
Indiana Utility Regulatory
Commission
302 W. Washington Street
Suite E306
Indianapolis, IN 46204

Ms. Cheryl L. Parrino, Chairman
Public Service Commission of
Wisconsin
4802 Sheboygan Avenue
P.O. Box 7854
Madison, WI 53707

Mr. W. Dewey Clower
G. Timothy Leighton, Esq.
National Association of Truck
Stop Operators
1199 N. Fairfax St., Suite 801
Alexandria, VA 22314

Ms. Catherine R. Sloan
Vice President, Federal
Affairs
LDDS Communications, Inc.
1825 I Street, N.W.
Suite 400
Washington, D.C. 20006

Ronald G. Choura, Esq.
Olga Lozano, Esq.
Telecommunications Section Policy
Division
Michigan Public Service Commission
P.O. Box 30221
Lansing, MI 48909-7721

Richard E. Wiley, Esq.
Danny E. Adams, Esq.
Brad E. Mutschelknaus, Esq.
Wiley Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

Leon M. Kestenbaum, Esq.
Jay C. Keithley, Esq.
H. Richard Juhnke, Esq.
Sprint Corporation
1850 M Street N.W., Suite 1100
Washington, D.C. 20036

Roy L. Morris, Esq.
Allnet Communications Services, Inc.
1990 M Street, N.W., Suite 500
Washington, D.C. 20036

Patrick A. Lee, Esq.
Edward E. Niehoff, Esq.
Joseph Di Bella, Esq
NYNEX
120 Bloomingdale Road
White Plains, NY 10605

Douglas N. Owens, Esq.
Northwest Pay Phone Association
4705 16th Avenue, N.E.
Seattle, WA 98105

Mr. Rick L. Anthony
Executive Vice-President
Quest Communications Corporation
6600 College Boulevard, Suite 205
Overland Park, Kansas 66211

Martin Mattes, Esq.
Richard Goldberg, Esq.
Graham & James
One Maritime Plaza
Suite 300
San Francisco, CA 94111

Michael B. Goldstein, Esq.
Dow, Lownes & Albertson
1255 Twenty-Third St., N.W.
Suite 500
Washington, D.C. 20037

Francine J. Berry, Esq.
Mark C. Rosenblum, Esq.
Peter H. Jacoby, Esq.
Richard H. Rubin, Esq.
AT&T
295 North Maple Avenue, Room 3244J1
Basking Ridge, NJ 07920

Kathleen Levitz, Acting Chief
Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W., Room 500-1600
Washington, D.C. 20554

John M. Goodman, Esq.
Charles H. Kennedy, Esq.
Bell Atlantic Corporation
1710 H Street, N.W.
8th Floor
Washington, D.C. 20006

Paul Rodgers, Esq.
Charles D. Gray, Esq.
James Bradford Ramsey, Esq.
NARUC
1102 ICC Building
P.O. Box 684
Washington, D.C. 20044

Floyd S. Keene, Esq.
Mark R. Ortlieb, Esq.
Larry A. Peck, Esq.
Ameritech Operating Companies
2000 W. Ameritech Center Drive
Hoffman Estates, IL 60196-1025

Randall B. Lowe, Esq.
Charles H.N. Kallenbach, Esq.
Jones, Day, Reavis & Pogue
1450 G Street, N.W., Suite 600
Washington, D.C. 20005-2088

Genevieve Morelli, Esq.
Competitive Telecommunications Ass'n
1140 Connecticut Avenue, N.W.
Suite 220
Washington, D.C. 20036

Lawrence E. Sarjeant, Esq.
Randall Coleman, Esq.
US West Communications
1020 19th St., N.W.
Suite 700
Washington, D.C. 20036

Keith J. Roland, Esq.
Roland, Fogel, Koblenz & Carr
One Columbia Place
Albany, NY 12207

Mary J. Sisak, Esq.
Donald J. Elardo, Esq.
MCI Telecommunications Corp.
1801 Pennsylvania Ave., N.W.
Washington, D.C. 20006

Gail L. Polivy, Esq.
GTE Telephone Companies
1850 M Street N.W., Suite 1200
Washington, D.C. 20036

Albert H. Kramer, Esq.
Robert F. Aldrich, Esq.
Keck, Mahin & Cate
1201 New York Avenue, N.W.
Penthouse Suite
Washington, D.C. 20005-3919

Martin T. McCue, Esq.
Linda Kent, Esq.
USTA
1401 H Street, N.W.
Suite 600
Washington, D.C. 20005-2136

Benjamin J. Griffin, Esq.
Lynn E. Shapiro, Esq.
Reed, Smith, Shaw & McClay
1200 18th Street, N.W.
Washington, D.C. 20036

Craig T. Smith, Esq.
United Telecommunications, Inc.
P.O. Box 11315
Kansas City, MO 64112

Walter Steimel, Jr., Esq.
Fish & Richardson
601 13th Street, N.W.
5th Floor North
Washington, D.C. 20005

Durward Dupre, Esq.
Richard C. Hartgrove, Esq.
John Paul Walters, Jr., Esq.
Southwestern Bell Telephone
Company
1010 Pine Street, Room 2114
St. Louis, Missouri 63101

James P. Tuthill, Esq.
Nancy C. Woolf, Esq.
Pacific Bell & Nevada Bell
140 New Montgomery Street
Room 1523
San Francisco, CA 94105

Lisa M. Zaina, Esq.
OPASTCO
21 Dupont Circle, Suite 700
Washington, DC 20036

Douglas F. Brent, Esq.
Advanced Telecommunications
Corporation
10000 Shelbyville Road
Suite 110
Louisville, KY 40223

Andrew D. Lipman, Esq.
Jean Kiddoo, Esq.
Swidler & Berlin, Chartered
3000 K Street, N.W.
Suite 300
Washington, D.C. 20007

Rochelle D. Jones, Esq.
Southern New England Telephone
Company
227 Church Street, Fourth Floor
New Haven, CT 06510-1806

Darrell S. Townsley, Esq.
Illinois Commerce Commission
160 North LaSalle Street
Suite C-800
Chicago, IL 60601

Mr. James B. Gainer, Section Chief
Ann E. Henkener, Esq.
Public Utilities Section
180 East Broad Street
Columbus, OH 42360-0573

Colleen M. Dale, Esq.
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102